

FILED

JUL 10 2023

Mark C. McCartt, Clerk  
U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

BYRON CORDELL THOMAS,

Defendant.

Case No. 23-CR-41-JFH

FOURTH SUPERSEDING  
INDICTMENT

[COUNT ONE: 18 U.S.C.

§§ 922(g)(1) and 924(a)(8) – Felon in  
Possession of a Firearm and  
Ammunition;

COUNTS TWO and TEN: 18

U.S.C. § 1512(b)(1) – Witness

Tampering by Corrupt Persuasion;

COUNTS THREE, FIVE, SEVEN,

and EIGHT: 18 U.S.C. § 2421 –

Transporting an Individual for  
Prostitution;

COUNTS FOUR and SIX: 18

U.S.C. § 2422(a) – Coercion and

Enticement to Engage in  
Prostitution;

COUNTS NINE, ELEVEN and

TWELVE: 18 U.S.C. § 1591 – Sex

Trafficking by Force, Fraud, and  
Coercion;

Forfeiture Allegation: 18 U.S.C.

§ 924(d)(1), 981(a)(1)(C), 1594(d),

and 2428, and 28 U.S.C. § 2461 –

Firearms, Prostitution and Witness  
Tampering Forfeiture]

THE GRAND JURY CHARGES:

INTRODUCTION

The Scheme and its Purpose

From on or about March 1, 2020, through on or about December 5, 2022, in the Northern District of Oklahoma and elsewhere, the defendant, **BYRON CORDELL THOMAS**, knowingly engaged in a scheme to recruit, entice, and transport women for the purpose of engaging in prostitution for his financial benefit, as alleged in this Superseding Indictment, including Counts Three through Nine.

**The Manner and Means of the Scheme**

In committing the crimes alleged in this Superseding Indictment, **THOMAS** and others, both known and unknown to the Grand Jury, accomplished the purpose of the Scheme through the following manner and means, among others:

1. **THOMAS** would and did cause women to engage in prostitution by using force, threats of force, fraud, and coercion.
2. **THOMAS** would and did rent and maintain hotel rooms in Tulsa, Oklahoma; Oklahoma City, Oklahoma; Dallas, Texas; Bossier City, Louisiana; and Wichita, Kansas, to harbor and maintain the women for conducting prostitution.
3. **THOMAS** would and did transport women to Dallas, Texas, for the purpose of engaging in street level prostitution.
4. **THOMAS** would and did isolate women, then transport them under false pretenses to another state and refuse to provide return transportation until the women earned a set amount of money through prostitution.
5. **THOMAS** would and did keep for his use and benefit all the money earned by the women, and would only give them limited money upon their request.

6. **THOMAS** would and did pay for lodging, food, clothing, and transportation for the women.

7. **THOMAS** would and did cause women engaged in prostitution to recruit other women to be prostitutes through fraud and deception.

8. **THOMAS** would and did use deception to conceal the prostitution from law enforcement.

9. **THOMAS** would and did instruct women engaged in prostitution to give false information to law enforcement.

10. **THOMAS** would and did intimidate, threaten, and corruptly persuade women to influence, delay, and prevent testimony in criminal proceedings, including the acts alleged in Counts Two and Ten of this Superseding Indictment.

11. **THOMAS** would and did use cellular telephone communications to promote, facilitate, and conduct acts of prostitution.

12. **THOMAS** would and did carry firearms, including the firearm described in Count One of this Superseding Indictment, in furtherance of his criminal activity to provide security for the criminal acts of prostitution.

13. **THOMAS** would and did carry firearms, including the firearm described in Count One of this Superseding Indictment, to intimidate women into performing acts of prostitution.

COUNT ONE  
[18 U.S.C. §§ 922(g)(1) and 924(a)(8)]

On or about December 5, 2022, in the Northern District of Oklahoma, the defendant, **BYRON CORDELL THOMAS**, knowing he had previously been convicted of at least one of the following crimes punishable by imprisonment for terms exceeding one year:

1. Aggravated Assault (Count One), Case No. 08CR1283, in the District Court of Sedgwick County, State of Kansas, on November 06, 2008;
2. Aggravated Assault (Count Two), Case No. 08CR1283, in the District Court of Sedgwick County, State of Kansas, on November 06, 2008;
3. Aggravated Assault, Case No. 08CR1256, in the District Court of Sedgwick County, State of Kansas, on November 06, 2008;
4. Possession of Controlled Substances (Cocaine), Case No. 10CR0807, in the District Court of Sedgwick County, State of Kansas, on August 05, 2010;
5. Criminal Possession of a Weapon by a Convicted Felon (Count One), Case No. 14CR1319, in the District Court of Sedgwick County, State of Kansas, on November 24, 2014;
6. Criminal Possession of a Weapon by a Convicted Felon (Count Two), Case No. 14CR1319, in the District Court of Sedgwick County, State of Kansas, on November 24, 2014;
7. Attempted Robbery (Count One), Case No. 15CR0271, in the District Court of Sedgwick County, State of Kansas, on March 09, 2016;
8. Attempted Robbery (Count Two), Case No. 15CR0271, in the District Court of Sedgwick County, State of Kansas, on March 09, 2016; and
9. Possession of Firearm AFCE, Case No. CF-2019-5866, in the District Court of Tulsa County, State of Oklahoma, on June 02, 2022,

knowingly possessed in and affecting interstate commerce the following firearm and ammunition:



1. A Ruger, Model EC9S, 9mm automatic pistol caliber, serial number 45855640; and
2. Seven rounds of Remington Peters 9mm caliber ammunition.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT TWO  
[18 U.S.C. § 1512(b)(1)]

From on or about January 6, 2023, through on or about February 6, 2023, in the Northern District of Oklahoma, the defendant, **BYRON CORDELL THOMAS**, knowingly and corruptly persuaded C.Z., a person known to the Grand Jury, and attempted to do so, with the intent to influence, delay, and prevent C.Z. from giving testimony in an official proceeding involving this case.

All in violation of Title 18, United States Code, Section 1512(b)(1).

COUNT THREE  
[18 U.S.C. § 2421]

From on or about July 1, 2022, through on or about December 5, 2022, in the Northern District of Oklahoma, the defendant, **BYRON CORDELL THOMAS**, transported C.Z., a person known to the Grand Jury, in interstate commerce with the intent that C.Z. engage in prostitution and other sexual activity for which a person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2421.

COUNT FOUR  
[18 U.S.C. § 2422(a)]

From on or about September 1, 2022, through on or about December 3, 2022, in the Northern District of Oklahoma, the defendant, **BYRON CORDELL THOMAS**, knowingly persuaded, induced, and enticed J.F., a person known to the Grand Jury, to travel in interstate commerce and engage in prostitution and other sexual activity for which a person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2422(a).



COUNT FIVE  
[18 U.S.C. § 2421]

From on or about September 1, 2022, through on or about December 3, 2022, in the Northern District of Oklahoma, the defendant, **BYRON CORDELL THOMAS**, transported J.F., a person known to the Grand Jury, in interstate commerce with the intent that J.F. engage in prostitution and other sexual activity for which a person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2421.

COUNT SIX  
[18 U.S.C. § 2422(a)]

From on or about October 1, 2022, through on or about October 22, 2022, in the Northern District of Oklahoma, the defendant, **BYRON CORDELL THOMAS**, knowingly persuaded, induced, and enticed T.B., a person known to the Grand Jury, to travel in interstate commerce and engage in prostitution and other sexual activity for which a person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2422(a).

COUNT SEVEN  
[18 U.S.C. § 2421]

From on or about October 1, 2022, through on or about October 22, 2022, in the Northern District of Oklahoma, the defendant, **BYRON CORDELL THOMAS**, transported T.B., a person known to the Grand Jury, in interstate commerce with the intent that T.B. engage in prostitution and other sexual activity for which a person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2421.

COUNT EIGHT  
[18 U.S.C. § 2421]

From on or about June 15, 2020, through on or about June 22, 2020, in the Northern District of Oklahoma, the defendant, **BYRON CORDELL THOMAS**, transported K.D., a person known to the Grand Jury, in interstate commerce with the intent that K.D. engage in prostitution and other sexual activity for which a person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2421.

COUNT NINE  
[18 U.S.C. § 1591]

From on or about March 1, 2020, through on or about July 26, 2022, in the Northern District of Oklahoma, the defendant, **BYRON CORDELL THOMAS**, in and affecting interstate commerce, knowingly recruited, entice, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited by any means M.N., a person known to the Grand Jury, and benefitted financially and by receiving anything of value from participation in a venture that had engaged in recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, patronizing, and soliciting M.N., and knowing that force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause M.N. to engage in commercial sex acts.

All in violation of Title 18, United States Code, Section 1591.

COUNT TEN  
[18 U.S.C. § 1512(b)(1)]

From on or about March 31, 2023, through on or about May 2, 2023, in the Northern District of Oklahoma, the defendant, **BYRON CORDELL THOMAS**, knowingly and corruptly persuaded C.Z., a person known to the Grand Jury, and attempted to do so, with the intent to influence, delay, and prevent C.Z. from giving testimony in an official proceeding involving this case.

All in violation of Title 18, United States Code, Section 1512(b)(1).



COUNT ELEVEN  
[18 U.S.C. § 1591]

From on or about June 1, 2019, through on or about January 1, 2020, in the Northern District of Oklahoma, the defendant, **BYRON CORDELL THOMAS**, in and affecting interstate commerce, knowingly recruited, entice, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited by any means C.T., a person known to the Grand Jury, and benefitted financially and by receiving anything of value from participation in a venture that had engaged in recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, patronizing, and soliciting C.T., and knowing that force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause C.T. to engage in commercial sex acts.

All in violation of Title 18, United States Code, Section 1591.

COUNT TWELVE  
[18 U.S.C. § 1591]

From on or about August 1, 2019, through on or about January 1, 2020, in the Northern District of Oklahoma, the defendant, **BYRON CORDELL THOMAS**, in and affecting interstate commerce, knowingly recruited, entice, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited by any means W.T., a person known to the Grand Jury, and benefitted financially and by receiving anything of value from participation in a venture that had engaged in recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, patronizing, and soliciting W.T., and knowing that force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause W.T. to engage in commercial sex acts.

All in violation of Title 18, United States Code, Section 1591.

**FORFEITURE ALLEGATION**  
**[18 U.S.C. §§ 924(d)(1), 981(a)(1)(C), 1594(d), and 2428,  
and 28 U.S.C. § 2461(c)]**

The allegations contained in this Second Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 924(d)(1), 981(a)(1)(C), 1594(d), and 2428, and Title 28, United States Code, Section 2461(c).

Upon conviction of the offenses alleged in this Second Superseding Indictment, as a part of his sentences, the defendant, **BYRON CORDELL THOMAS**, shall forfeit to the United States any firearm and ammunition involved in or used in the knowing commission of such offenses. The property to be forfeited includes, but is not limited to:

**FIREARM AND AMMUNITION**

1. A Ruger, Model EC9s, 9mm automatic pistol caliber, serial number 45855640;
2. Approximately seven rounds of Remington Peters 9mm caliber ammunition;  
and
3. Any and all ammunition or magazines not specified.

All pursuant to Title 18, United States Code, Sections 924(d)(1), 981(a)(1)(C), 1594(d), and 2428, and Title 28, United States Code, Section 2461(c).

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A TRUE BILL

  
KENNETH ELMORE  
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/s/ Grand Jury Foreperson  
Grand Jury Foreperson